

REVIEW OF ADULT AND COMMUNITY EDUCATION (ACE) FUNDING FRAMEWORK CONSULTATION DOCUMENT

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ABSTRACT

This paper is one of three commissioned by ACE Aotearoa. It is intended to review the TEC consultation document on the proposed new funding framework released on 9 March 2005. The first part of this paper provides an overview of the document. The paper then moves on to a discussion and critique of it before concluding by highlighting some key questions. This paper has had to be prepared in a week and I am very conscious of the short gestation period and the fact that it is likely to suffer from this. Nevertheless I hope that it will be of some help in stimulating people involved in ACE to engage more fully with the ideas and proposals contained in the document itself. The paper draws attention to a number of very positive features of the consultation document. The document provides a useful overview of current ACE provision and outlines government decisions which have already been made concerning ACE funding. It proposes a set of criteria which it suggests should characterise a 'successful' funding framework and describes the key components of the funding framework which it proposes. It concludes by outlining the next steps in the development and implementation of the framework.

The document builds on the work of a number of groups. Its proposals are also based on a number of key decisions which have already been made by government. The document states that it '...is important to note the decisions of government are not the subject of this consultation'. The focus is on how the decisions already taken can most effectively be implemented.

This paper suggests that this presents some difficulties since the effectiveness of the framework rests to some extent at least on the quality and coherence of some of these previous decisions. For example decisions on the nature of the ACE priorities, on the principles which should underpin the new funding framework and on the nature of the funding pool all have direct effects on the proposals contained in this document. In view of this therefore the document contains few surprises. Its purpose is to recommend the kind of framework which will meet the requirements of

government and ensure a level of security of funding for ACE - the kind of security and level of funding which has been lacking over the past decades.

This paper then discusses a number of limitations and questions concerning the document and its proposals, not all of which can be attributed to the TEC. It points to the serious gap arising from the decision by government to review the ACE contributions of Tertiary Education Institutions separately early next year. It also addresses the following issues: Does the proposed framework succeed in offering financial security? Would a funding formula be useful? Would charters and profiles provide the security needed? Would it be useful to fund a central ACE body with a wide range of functions? Does the proposed framework allow or encourage those engaging in ACE to maintain a critical edge within their programmes? Is the notion of identifying community learning needs adequate as a key component of the proposed funding framework?

In the conclusion I state that some of the above questions I would like to explore further and that there are several additional questions and issues I would wish to raise. These include question about how the framework is going to ensure that funding is made available to undertake the many research tasks clearly arising out of TEC's ongoing project? Who will undertake this research? And how will we ensure that the research capabilities in ACE continue to be promoted and fostered? I would like to see further discussion of the nature of the monitoring required and the place of critical reflection by those engaged in ACE programmes. I would like to pursue further the question whether the TEC has given sufficient attention to the need for resources both for the kinds of participatory action research which will be useful to ACE practitioners and to enable those committed to the future of ACE as a sector to be able to develop their knowledge, skills and understandings and those with whom they work.

A Introduction

This paper is one of three commissioned by ACE Aotearoa. It is intended to review the TEC consultation document on the proposed new funding framework released on 9 March 2005 (Tertiary Education Commission Te Amorangi Mātauranga Matua, 2005). The first part of this paper provides an overview of the document. The paper then moves on to a discussion and critique of it before concluding by highlighting some key questions. This paper has had to be prepared in a week and I am very

conscious of the short gestation period and the fact that it is likely to suffer from this. Nevertheless I hope that it will be of some help in stimulating people involved in ACE to engage more fully with the ideas and proposals contained in the document itself.

B Overview of the document

1. Background Section

Following the Executive Summary and a short introduction which outlines the nature, purpose and structure of the document and processes for gathering feedback, the document moves on to a 10-page Background section. This section provides an overview of ACE provision. Part A describes activities and participants in the ACE sector, together with key provider groups; Part B summarises ACE cost structures and current funding arrangements; and Part C outlines a wide range of recent government decisions impacting on the ACE sector.

These include the following: In March 2003 Government adopted the following five national priorities for ACE provision: (a) targeting learners whose initial learning was not successful; (b) raising foundation skills; (c) encouraging lifelong learning; (d) strengthening communities by meeting identified community learning needs; and (e) strengthening social cohesion. More recently government has agreed to an initial set of performance indicators related to the ACE priorities. These are included in the document. All five ACE priorities are considered to be important, and it is intended to reach a balance in provision across these priorities over time.

Government has directed that ACE funding should: move away from a model based on 'type of provider' to one based on the type of provision and the learning outcomes being delivered; to be provided through a single framework; and support programmes and activities on the basis of their alignment with ACE priorities. The pool of funds to be distributed through the new funding framework will draw together current government funding for school-based ACE activities and programmes, Rural Education Activities Programmes (ACE component only), other tertiary education providers (OTEPs) engaged in ACE provision, and the Correspondence School (ACE component only).

The pool of funds to be administered through the new ACE funding framework totals approximately \$24.5 million. Funding for TEIs providing ACE programmes is not included in the ACE pool at this stage. As directed by government, the TEC will be reviewing the funding arrangements for TEIs engaged in ACE provision in early

2006.

Government has also agreed to principles on which the new funding system would be based. These principles reflect the particular role and contribution of ACE to the tertiary sector as well as the priorities of the Tertiary Education Strategy and the Integrated Funding Framework. They are:

- Access to quality community-based learning opportunities for adults should be widely available;
- Quality provision, focused on achieving ACE national priorities, and responsive to community learning needs;
- ACE should be affordable for government, with good accountability by providers for public funding;
- Learners should know what learning outcomes they achieve;
- Equity and transparency in funding across the ACE sector;
- Opportunities for both formal/assessed and non-formal/non-assessed learning; and
- Minimal costs to priority learners by giving priority to those providers that best respond to priority learners'.

In future, as part of new funding arrangements that will be phased in from 2005, ACE funded provision will be based on alignment with these ACE priorities and principles. The ACE Fund, ACE Outcomes and associated performance indicators are the subject of a Ministry of Education Cabinet paper that is currently in its final draft stage' (Tertiary Education Commission Te Amorangi Mātauranga Matua, 2003).

Government has also determined that inter alia the funding framework should ensure access to ACE provision is widely available across the country and enable any provider to apply for funding. Moreover, by 2008 all ACE providers receiving funding from the TEC must comply with ACE quality assurance arrangements.

2. Criteria for a new funding framework

From the discussion summarised above, it should be clear that the government has already made many of the key decisions needed to establish a new funding framework. In Section 2 (pp 11-13) the document proposes a set of four criteria for the new funding framework which it sees as setting out '.. what the framework is trying to achieve, and against which alternative approaches can be assessed' (p11).

The proposed criteria are as follows: (a) The funding framework should maximise TEC-funded ACE provision in line with the five ACE priorities. Moreover, it should 'reflect a balance across all five priority areas', with 'quality ACE programmes and activities .. widely available and accessible to adults'. This provision should be 'both focused on the national priorities and responsive to identified community learning needs'. (b) Secondly, the funding framework should support a diverse range of providers and learning approaches. 'Funding mechanisms will need to be flexible enough to respond to differences in organisational form, cost structures and mode of delivery. The funding framework should capitalise on the strengths of different provider types and accommodate a range of learning contexts'. (c) Thirdly, the funding framework should be transparent and equitable. It should support and reinforce realistic, cost-efficient provider cost structures, avoid creating inappropriate incentives, be administratively simple and keep compliance costs to a minimum. (d) Fourthly, the funding framework should support a smooth transition from current ACE provision to an ACE sector that is more closely aligned with government priorities. The document states that: 'The government's expectation is that change will be managed very carefully over a number of years to ensure that changes don't impact adversely on providers and learners'.

3. The Funding Framework

Section 3 (pp 14-27) sets out the key components of the proposed funding framework.

Part A proposes 'a process for identifying community learning needs'. As noted previously, it points out that government has already decided that the funding framework must ensure that TEC funding for ACE should go to support programmes and activities that contribute to the national priorities for ACE provision. 'At the same time, funding decisions will need to be informed by a sound understanding of the learning needs within particular communities' (p 15). The document suggests that these needs will comprise: 'individual learning needs that are prevalent within a community (e.g. high level of demand for parenting skills training), and learning needs that impact on the capacity of the community itself (e.g. the need to enhance the capacity of the volunteer workforce to run community groups)'.

The document suggests that prioritisation of funding within and between the five ACE priority areas will require an understanding of the need for particular categories or kinds of ACE programmes and activities within a community (Categories here refer to

such things as the focus, content and mode of delivery of programmes.), the existing supply of particular categories of programmes and activities, the gaps in ACE provision, including the unmet needs in each ACE priority area and the capacity of the community to respond to identified needs.

The document then goes on to describe a proposed model for use in identifying community learning needs. It proposes that responsibility for identifying community learning needs should remain with providers who 'would be expected to have robust processes in place for identifying community learning needs within their regions'. The TEC would support providers in this task through the provision of good practice guidelines and collaboration would be encouraged. It is envisaged that the community learning needs assessment process should: 1. define the community covered including such factors as the ethnicity, age profile and SES of the population, 2. incorporate a strong learner focus with input being sought directly from both existing and potential learners, and 3. involve a range of key stakeholders at the local level.

Part B outlines a system for assessing and prioritising programme provision. It considers three questions: (a) Firstly, what programmes and activities should be eligible for ACE funding? Two broad approaches are considered: Under option 1 government funding would be limited to programmes directly focused on ACE priorities, whereas under option 2 a broader range of programmes including any programmes which contribute directly or indirectly to ACE priorities would be eligible for funding. The document pointed out that many programmes and activities not directly aligned with ACE priorities, do make significant contributions to these areas. It therefore concluded by supporting the second, more liberal option.

(b) Secondly, should funding levels reflect the relative contributions that programmes make towards ACE priorities? Once again two broad approaches are considered. *Option one – Variable funding* – under this option programmes and activities would be funded at varying levels to reflect their relative contributions to ACE priorities. *Option two – Uniform funding* – under this option all programmes and activities would be funded at the same level regardless of their fit with ACE priorities. The document concluded that ACE activities and programmes should be funded by TEC at varying levels that broadly reflect the relative contributions that they make to ACE priorities rather than at a uniform level.

(c) Thirdly, how should programmes and activities be assessed for fit with the ACE priorities? In response to this question the document stated that the TEC considered that:

- providers are best placed to assess the extent to which their own activities and programmes contribute to ACE priorities.
- TEC's role should be to provide the tools and guidance to assist individual providers to make objective assessments of their programmes.
- a provider's overall contribution to ACE priorities should be calculated by aggregating assessments of individual learning activities, or groups of activities (e.g. 'parenting programmes').
- TEC should bulk fund a provider's total set of activities and programmes.

In the light of this the document moves on to provide an example of a proposed self-assessment questionnaire to be completed by providers. It requires providers to classify each of their programmes and activities in one of the following categories in relation to each of the five programme areas:

- Category A - Specified primary focus is on an ACE priority area
- Category B - Specified primary focus is not on an ACE priority area, but nevertheless has a high impact on one or more priority areas
- Category C - Specified primary focus is not on an ACE priority area, but nevertheless has a moderate or incidental impact on one or more priority areas
- Category D - Specified primary focus is not on an ACE priority area, and it has no or minimal impact on a priority area.

Under this proposal providers would aggregate their assessments of individual programmes and activities and supply summary reports to TEC which would in turn make bulk funding allocations based on these self-assessments. The TEC proposes that all assessments should be freely available across the sector, on request, to encourage transparency and consistency. It states that it would not scrutinise each assessment. However, from time to time, it might consider particular categories of assessment more closely, to ensure consistency of process, and to assess the effectiveness of the supporting guidelines.

Part C discusses the proposed approach to calculating funding rates and ensuring a balance of provision across the ACE priority areas. (a) Firstly, it considers whether the approach to funding should focus on volumes of learning provided (outputs), or

include an element of base funding for each programme or activity (inputs). Two basic options for calculating providers' bulk funding allocations are considered: *Option one* – a fixed dollar amount per activity/programme plus a component reflecting learner numbers and duration of learning;

Option two – a calculation based on learner numbers and duration of learning.

The document proposes that funding for ACE programmes and activities should be calculated on the basis of a fixed dollar amount per activity/programme, plus a component reflecting learner numbers and duration of learning. It acknowledges that funding allocations based on learner numbers and duration of learning would be more likely to maximise provision in line with ACE priorities. However, it supports Option one because it maintains diversity by accommodating a wider range of provider cost structures, and is more likely to support a smooth transition to the new funding framework.

(b) Secondly, the document discusses the calculation of funding rates. To calculate the new funding rates the document points out that TEC will require an understanding of (a) the overall spread of programme provision across the ACE priority areas, (b) the extent to which current funding levels are aligned with these priorities, and (b) the key variables to be factored into the model. (These include major drivers of additional costs, or savings, associated with particular categories of programme or modes of delivery – such as the use of volunteer tutors, government provided accommodation, funding from other sources.) The document reports that TEC proposes to gather this information from a representative sample of providers across the sector in 2005.

Under the proposed funding framework, the TEC plans to use this information to calculate funding rates to ensure that higher rates of funding are directed to those programmes which make the most significant contribution to ACE priorities (Category A and B provision). Residual funding from the ACE pool would then be available to subsidise Category C activities. Category C provision would need to be supported by higher learner fees, or from other sources of funding. The bulk funding allocated to providers on the basis of these calculations will include allocations for coordination and administration. This means that the specific funding currently received by some providers for coordinator positions will be phased out.

(c) Thirdly, the document considers how an appropriate balance of provision can be achieved. In order to achieve a balanced provision of programmes and activities

across the five priority area over time, the document reports that the TEC proposes to determine whether there is a need for reserved pools of funding for particular categories of provision during 2006, for possible implementation 2007. The TEC will work with networks and providers to actively promote provision in identified areas of unmet learning needs.

4. Additional specific issues

This fourth section (pp 29-34) considers a number of additional specific issues that the funding framework must address and outlines the proposed approach to the phasing in of the new funding framework.

The issues addressed include the funding of small community providers, ensuring an appropriate spread of funding across regions, monitoring and phasing in the proposed new funding model.

(1) Firstly the document considers funding for small community groups. The importance of community groups is recognised and in particular their contributions and potential contributions to ACE priorities. For the purpose of this document 'small community groups' are defined as 'those seeking funding of less than \$10,000 per annum from the TEC, and therefore are exempt from Charter and Profile requirements' (p29). The document reviews briefly current arrangements for funding these groups from Vote Education. These consist of tutor hours available from schools and grants from CLANZ. It points to some limitations including possible variations in the effectiveness of school-based support and the relatively low level of funds available to CLANZ.

The document states that the TEC proposes that: (a) the existing community allocation available through schools should be reserved as a pool for funding small community providers; (b) a number of 'lead providers' should be identified, with responsibility for funding and supporting small providers within a defined geographical area, and (c) these lead providers would receive explicit funding for this function, and in turn would provide active support to the community groups – this might include mentoring, volunteer training, and help to get funding from other sources. In addition, it proposes that (d) close relationships between schools and local community groups should continue to be fostered.

(2) Secondly, consideration is given to ways of ensuring an appropriate spread of funding across regions. The document notes that (a) the government is concerned to ensure that ACE activities and programmes are widely accessible and that funding administered by the TEC will, over time, support a reasonably even geographical spread of ACE provision across the country; and (b) to date, funding for ACE programmes and activities has not been systematically allocated on a regional basis and no analysis has been undertaken of the appropriateness of the current geographical distribution of funding. Accordingly it proposes that a comprehensive assessment of the regional spread of ACE funding be undertaken during 2008, by which time the new funding framework will have been fully implemented.

(3) Thirdly, consideration is given to issues of monitoring. The document proposes that TEC should develop a common set of monitoring requirements for all providers receiving funding from the ACE pool. Monitoring requirements are likely to focus on three broad areas: programme delivery; financial accountability; and compliance with ACE quality assurance arrangements.

(4) Finally, consideration is given to questions concerning the phasing in of the proposed new funding model. The document notes that a smooth transition to a variable funding system could be facilitated by ensuring that new funding levels are phased in at a rate that allows providers to adapt, either by increasing fees for activities and programmes with low impact on priority areas, and/or by refocusing activities and programmes towards priority areas. Accordingly the document proposes that the new approach be phased in over the period between 2005 and 2008 by which time it should be fully implemented.

5. Where to from here?

This concluding section considers the implications (regarding funding, administration and compliance) of the proposed new framework for providers, learners and the TEC. The section also outlines the next steps in the development and implementation of the framework.

This is the section which will be especially closely scrutinised by all those organisations affected by the proposals. These include most state secondary schools, the Correspondence School, thirteen REAPs, six 'OTEPs' engaged in ACE programmes, viz the National Association of ESOL Home Tutor Schemes, Literacy Aotearoa, Pasifika Education Centre, the Multi-cultural Centre of Learning and

Support Services (MClASS), the Federation of Workers Education Associations (FWEA) and the National Resource Centre for Adult Education and Community Learning (NRC), small community groups and new providers.

Appendixes

The document also includes a number of very important appendixes. Appendix 1 consists of a Submission Sheet which sets out twelve key questions and asks people to indicate whether they agree with the proposal and if not to indicate their reasons. It seems to me that this is a very useful way of engaging with those wishing to make submissions. Appendix 2 gives the TEC contact details around the country. Appendix 3 consists of an historical overview of funding arrangements. Appendix 4 consists of examples of the application of an assessment matrix to three programmes: Home cooking; Guitar for beginners; and ESOL for refugees. Finally Appendix 5 summarises the government's priorities for ACE. It includes a statement of each priority together with a description and a set of primary objectives in each priority area.

C Discussion

General

There are a number of very positive features of the consultation document. It is a clear and concise document. Its ideas and arguments seem to be advanced coherently. In several instances, as we have seen, it sets forward and examines alternative points of view on several issues and then makes a recommendation based on a reasoned and informed examination of the arguments. It provides a useful overview of current ACE provision and outlines government decisions which have already been made concerning ACE funding. It proposes a set of criteria which it suggests should characterise a 'successful' funding framework and describes the key components of the funding framework which it proposes. It concludes by outlining the next steps in the development and implementation of the framework. The document appears to be based on discussion with a number of people involved in ACE and demonstrates considerable insight and understanding of the sector.

The document builds on Koia! Koia! (Adult Education & Community Learning Working Party, 2001) and on the work which has been done by the Ministry of Education and the TEC and their Reference Groups since the publication of the Working Party's report in mid-2001 (Tertiary Education Commission Te Amorangi Mātauranga Matua, 2003, 2004a, 2004b). As indicated above, the document's

proposals are also based on a number of key decisions which have been made by government over the past three years. One of these, communicated to the ACE sector last year, was to introduce a new funding framework which would 'draw together current diverse funding arrangements, and introduce a shift away from funding based on 'type of provider' to a funding system focused on the type of learning outcomes being achieved'.

The document states that it '..is important to note the decisions of government are not the subject of this consultation. The focus of this paper is on how the decisions already taken can most effectively be implemented'. This presents some difficulties since the effectiveness of the framework rests to some extent at least on the quality and coherence of some of these previous decisions. For example decisions on the nature of the ACE priorities, on the principles which should underpin the new funding framework and on the nature of the funding pool all have direct effects on the proposals contained in this document.

In view of this therefore the document contains few surprises. Its purpose is to recommend the kind of framework which will meet the requirements of government and ensure a level of security of funding for ACE - the kind of security and level of funding which has been lacking over the past decades. All this reflects the changes in the wider political context. In the 1990s ACE was effectively marginalised and it is only since 2000 that 'Cinderella' has begun to come in from the cold as far as government funding and policy development is concerned (The 'Cinderella' metaphor to describe the position of ACE was first used in 1991 by an Australian Government Standing Committee (Senate Standing Committee on Employment Education and Training, 1991).

Some questions and possible limitations

There are a number of limitations and questions concerning the document and its proposals, not all of which can be attributed to the TEC.

The absence of Tertiary Education Institutions from this review

Firstly, the document and its proposals do not address questions concerning the funding of those forms of ACE provided by tertiary education institutions such as universities, polytechnics, colleges of education and wananga. Necessarily therefore this leaves something of a hole in the document, which notes that government has decided that this issue will be addressed in early 2006.

Does the proposed framework succeed in offering financial security?

Secondly, there is some question whether the proposed framework will in fact provide the kind of financial security for ACE that government and TEC wish to provide. There are a number of features of the proposed framework which seem to work against this security. As indicated above the proposals rests on a number of political decisions and such decisions can always be reversed. The fact that the framework is intended to reflect the priorities of governments and to be closely aligned with these priorities must raises questions about what will happen in a policy environment which is less favourably disposed to ACE and/or where the government's priorities are such that ACE is seen to have little to offer.

The call to align funding as closely as possible with ACE priorities which are determined by the government does have the effect of exposing ACE programmes and activities to the winds of political change. There appears to be little by way of a buffer which could resist these winds. It is imperative therefore that some further thought be given to including within the funding framework provision for buffers which will limit the vulnerability of ACE to party political forces. The history of ACE (Dakin, 1988; Tobias, 1999a) highlights the way in which ACE has frequently been more vulnerable to these forces than other educational sectors. The framework, then, offers little protection - no effective cushion - in the event of the election of an unsympathetic government.

It may be argued that it would be unrealistic to expect such protection from the possibilities of future predations. However this kind of issue does need to be addressed. Some measure of protection from party political interference and especially interference by governments can be achieved by various means. These include setting in place strong institutionalised mechanisms through which funding decisions can be made beyond the short-term pressures of day-to-day party politics.

Would a funding formula be useful?

One mechanism which has been used extensively especially in recent times to ration funding in the wider field of tertiary education has been the funding formula. In its simplest form this has been based on the number of equivalent full-time students attending particular programmes - the so-called EFT system of funding. In this way it has been argued that funding must closely follow student demand. Wisely in this document the TEC expressly rejects the use of a '...formulaic approach, such as

funding based purely on the number of students engaged'. This is an important point. The document rejects this approach on the grounds that it 'can encourage behaviour that focuses primarily on revenue maximisation'. Other arguments against such an approach rest on the complexities and subtleties of truly effective programme development in ACE. This can be highly labour-intensive and can rely on high levels of insight and understanding of the communities being served and their interests and aspirations, as well as insight and understanding of the kinds of expectations and resources of other relevant stakeholders.

Would charters and profiles provide the security needed?

A second mechanism which has been used extensively in the past to reduce possibilities of party political interference is to attach ACE provision to institutions responsible for other forms of education such as schools, polytechnics and universities. While such a practice may provide some measure of protection for ACE it carries with it the danger of institutionalised marginalisation and a very real danger that ACE provision will reflect the priorities of host institutions rather than those of ACE's own constituents and potential constituents. In more recent times charters and profiles have been seen as mechanisms to use to provide some measure of both protection and accountability. These mechanisms may be used as a form of protection within the context of larger organisations. However they are essentially bureaucratic means subject to political forces and offer little possible protection for small groups and organisations.

Would it be useful to fund a central ACE body with a wide range of functions?

Another mechanism is to set in place legislatively one or more institutions with a primary focus on ACE in all its forms. In New Zealand historically this approach is associated with the National Council of Adult Education (NCAE) which existed in one form or another from 1938 to 1988 (Dakin, 1988; Tobias, 1999a). Over much of this period the NCAE performed a number of roles which included leadership and coordination of the field, advisory and advocacy functions to groups, organisations, educational institutions, government departments and ministers of education, the promotion of research and development and a pioneering role. The NCAE was however always under-funded (reflecting the relatively low position of ACE in the educational pecking-order through much of the time). Hence it was seldom able to meet to the full the great expectations that were held for it by many of those involved in ACE. Perhaps however many of the difficulties faced by the NCAE could also be traced to its legislative form. In particular its governing body was narrowly

constituted. At the time when it went into recess the Council itself was promoting new legislation to re-name and re-constitute itself. This among other things would have strengthened the organisation and broadened the constituency of those who were to elect and appoint the Council itself.

In the light of this it is unfortunate, though perhaps not surprising, that no consideration seems to have been given by TEC or by the government to the question whether such a central body would be useful or not within the context of maintaining security of funding. Presumably this is because the TEC sees itself as performing this role. However it could be argued that although the TEC can indeed perform such a role its mandate covering the whole field of tertiary education is so broad that it is not hard to envisage circumstances when the TEC might cease to function effectively in supporting ACE. Moreover, the nature of ACE is such that a central

Does the proposed framework allow or encourage those engaging in ACE to maintain a critical edge within their programmes?

Neither the government nor the TEC in this document seems to have paid sufficient attention to the oppositional and contested nature of many of the very best ACE programmes around the world and in Aotearoa (Crowther, Martin, & Shaw, 1999; Delahunty, 2003; Foley, 1999, 2003; Horton, 1989; Johnson, 1979; Newman, 1994; Paulston, 1980; Smith, 1999; Stalker, 2003; Tobias, 2000; Walker, 1980, 1982, 1990).

The elaboration of the government's statement of priorities, as presented in the draft set of performance indicators (p 10), contains some hint that further work is being done to strengthen these priorities. Thus for example two priority areas 'Strengthening social cohesion' and (encouragingly) 'Targeting learners whose initial learning was unsuccessful' both contain the same phrase 'Promoting and building active citizenship' as one of the outcome descriptors. This is an important expansion of these priorities. However notions of active citizenship can be expansive or restrictive (Tobias, 2000) and further work on all of the priorities is sorely needed if they are to legitimate the funding of programmes which engage with critical ideas, give voice to oppositional movements and engage in social action.

As they stand, the priorities may be read largely as an extension of schooling. They discount the contested and action-oriented nature of many ACE programmes.

‘Strengthening social cohesion’ may readily be seen as assimilationist and grounded in liberal-functionalist social theory; ‘Strengthening communities..’ is similar especially when it is reduced by the qualifying phrase ‘meeting community needs’ with no explicit recognition of the way in which this phrase has been used extensively as an ideological tool to mask inequalities in the political economies of nations.

It may be argued that the other priorities also need further work to ensure that they incorporate both a breadth of vision and a critical edge. For example the priority areas devoted to ‘encouraging lifelong learning’ and ‘raising foundation skills’ may both very readily be reduced and left to serve ameliorative ends. They may readily focus on correcting the perceived ‘deficits of individuals’. Or they may focus on persuading or ‘motivating’ people to climb social and economic ladders and on giving them the ‘skills they need’ to ‘succeed’. All this may be done rather than challenging the composition of the ladders and/or possibly looking at transforming them (Tobias, 1999b). ‘Foundation skills’, then, should be seen as a problematic notion. For example, people who cannot read and write very well can be very effective in the work-place, in the home and in public life, while many people who are highly literate may not be very competent in these other spheres of living. In addition ‘encouraging lifelong learning’ must allow for the development of the broadest, richest and deepest ACE curriculum possible.

Is the notion of identifying community learning needs adequate as a key component of the proposed funding framework?

As noted previously, the document points out that government has already decided that the funding framework must ensure that TEC funding for ACE will go to support programmes and activities that contribute to the national priorities for ACE provision.

At the same time, the TEC points out, ‘funding decisions will need to be informed by a sound understanding of the learning needs within particular communities’ (p 15). The document suggests that these needs will comprise: ‘individual learning needs that are prevalent within a community (e.g. high level of demand for parenting skills training), and learning needs that impact on the capacity of the community itself (e.g. the need to enhance the capacity of the volunteer workforce to run community groups)’. The document then goes on to describe a proposed model for use in identifying community learning needs. It proposes that responsibility for the identification of community learning needs should remain with providers who ‘would be expected to

have robust processes in place for identifying community learning needs within their regions’.

There are some ambiguities, tensions and difficulties surrounding several key concepts here. The notion of ‘community’ is ambiguous and is used in many different ways. In this document it seems at times that ‘communities’ must be regional rather than local or national whereas at other times the reference seems to be to ‘communities of interest’ or to ‘ethnic communities’. These differences need to be clarified especially when the notion of ‘community’ is being used in combination with other ambiguous words.

It has been noted above that notions of ‘community learning needs’ and their ‘identification’ or ‘assessment’ are often used to mask or disguise relations and structures of power and the ideologies which underpin them. These include beliefs which attribute social problems to individual or community ‘deficits’, ‘inadequacies’ or ‘incapacities’. Moreover it is often implied that these ‘needs’ exist in some objective sense and that their identification involves a technical, diagnostic procedure which can be carried out by a provider or educator in a neutral, value-free and a-political manner. Once one recognises the ideological nature of these concepts and processes it becomes clear that the tasks of identifying and assessing needs cannot be undertaken in a value-free or politically neutral manner.

Although it is clear that the document does go beyond a narrow welfarist notion of ‘meeting community learning needs’, it seems nevertheless at times that it may not have escaped this discourse or ideology entirely. Some of the examples provided may be read to imply that someone has found that the parents and volunteers concerned have certain deficits or are lacking certain skills. Although the deficit model’ is softened by the use of the word ‘demand’ in the first example, this in turn raises the question whether or not the term ‘need’ is required at all in this instance. A key question seems to be: who determines that there is a need for any particular programme?

The welfarist ideology underpinning many needs-based approaches to ACE programme development is moderated in the document at another point by the explicit reference to ‘aspirations’ as well as to the complexity of the process of needs identification. It states that: ‘The learning needs and aspirations of communities will be diverse, and may be influenced by a variety of factors including the ethnic

composition of the population, relative economic strength, current community sector capacity, and social and environmental factors (e.g. rural versus urban issues)'. Clearly in this context it is difficult to see the process in purely technicist terms.

It does seem that the proposals contained in the document are quite substantial and call for the collection of a good deal of data from learners and potential learner, from other agencies and groups and from a wide range of stakeholders. Whether all this will have the consequences which are hoped for and intended by the TEC is another question.

Perhaps partly as a consequence of the linear, 'needs-meeting programme planning model adopted, the document fails, in my view, to do full justice to the way in which learning by adults cannot always be separated neatly from action. ACE may offer programmes to adults as learners; it may also engage with adults individually or collectively - as members of their whanau, iwi, & hapu; their family, work, leisure, social action, cultural, sporting & political groups - to pursue their economic, cultural, social or political interests, aspirations and visions. One of the underlying missions of many ACE practitioners is not so much to identify and meet people's needs. It is rather to engage with people as human beings and where possible to engage with them in the kinds of learning and action which interests them, and to work with them to transform themselves and their conditions, by challenging them to discover new possibilities for themselves and others in their lives.

It is a mistake to think of the ACE programme planning process as a linear one in which learning needs are identified before mounting a programme. This may happen with some programmes. However some of the most effective programme development take place as sometime learners/sometime educators engage together in learner, planning, action and critical reflection.

D Conclusion

In the earlier sections of this paper I attempted to summarise the TEC document. I then moved on to a discussion of selected aspects of the document. In the first section of this discussion I complimented the TEC on many aspects of the document including its clarity and coherence. In my view the document goes a long way towards resolving difficult issues in a satisfactory manner. I have then gone on to raise a number of questions and point to some limitations in the document. These questions include the following: Does the proposed framework succeed in offering

financial security? Would a funding formula be useful? Would charters and profiles provide the security needed? Would it be useful to fund a central ACE body with a wide range of functions? Does the proposed framework allow or encourage those engaging in ACE to maintain a critical edge within their programmes? Is the notion of identifying community learning needs adequate as a key component of the proposed funding framework?

Some of the above questions I would like to explore further and there are several additional questions and issues I would wish to raise. These include question about how the framework is going to ensure that funding is made available to undertake the many research tasks clearly arising out of TEC's ongoing project? Who will undertake this research? And how will we ensure that the research capabilities in ACE continue to be promoted and fostered? I would like to see further discussion of the nature of the monitoring required and the place of critical reflection by those engaged in ACE programmes. I would like to pursue further the question whether the TEC has given sufficient attention to the need for resources both for the kinds of participatory action research which will be useful to ACE practitioners and to enable those committed to the future of ACE as a sector to be able to develop their knowledge, skills and understandings and those with whom they work.

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